



The future of mobile communications ... now.

October 31, 1996

Mr. William P. Caton  
Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

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**Re: Reply Comments in RM-8887; PR Docket No. 93-144, In the  
Matter of Geographic Partitioning and Spectrum Disaggregation by 900  
MHz Specialized Mobile Radio Service Major Trading Area Licenses**

Dear Mr. Caton:

Transmitted herewith, on behalf of Geotek Communications, Inc., is an original and four (4) copies of Reply Comments filed in the above-referenced proceeding. Copies of the pleading have been duly served on the parties noted below.

If any questions should arise related to this matter, kindly contact the undersigned counsel at (201) 930-5346.

Sincerely yours,



Susan H.R. Jones

Enclosure

cc: International Transcription Service (w/Enclosure)  
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Washington, D.C. 20554

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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OFFICE OF SECRETARY**

<b>In the Matter of</b>	)	
	)	
<b>Geographic Partitioning and Spectrum</b>	)	<b>RM-8887</b>
<b>Disaggregation by 900 MHz</b>	)	<b>PR Docket No. 93-144</b>
<b>Specialized Mobile Radio Service</b>	)	
<b>Major Trading Area Licenses</b>	)	

**Reply Comments**

Geotek Communications, Inc. and its wholly-owned subsidiaries (together, "Geotek"), pursuant to Section 1.405 of the rules and regulations of the Federal Communications Commission ("FCC" or "Commission"), 47 C.F.R. § 1.405, hereby files these Reply Comments in the above-referenced proceeding. Geotek's Reply Comments respond specifically to the Comments ("Comments") submitted by the Rural Telecommunications Group ("RTG") which opposed the Petition for Rule Making filed by American Mobile Telecommunications Association, Inc. ("AMTA"), entitled "In the Matter of Geographic Partitioning and Spectrum Disaggregation by 900 MHz Specialized Mobile Radio Service Major Trading Area Licensees" (the "Petition").<sup>1</sup>

RTG asserts that AMTA's proposal to permit partitioning and disaggregation of 900 MHz specialized mobile radio ("SMR") licenses would "hinder the delivery of SMR services to rural America."<sup>2</sup> This is contrary to the arguments unanimously posed by the other commenters in this proceeding, including Geotek. In fact, regulatory flexibility in

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<sup>1</sup> Geotek filed Comments in this proceeding on October 21, 1996.

900 MHz SMR major trading area (“MTA”) licensing promotes faster delivery of SMR services to rural or traditionally underserved areas by increasing the number of service providers able to enter the SMR market. It is self-evident that multiple service providers in a marketplace will speed the delivery of a product. Competition, among other benefits, triggers a “race” to deliver the product.

In addition, as Geotek noted in its Comments, allowing partitioning will permit Geotek to break off those rural or underserved regions of its MTA licenses, and license those areas to another service provider. The other service provider will concentrate its efforts in building out its partitioned license at typically the same time that Geotek builds out its major urban markets in accordance with its business plan. Thus, service will be provided to the public in *both* segments of the MTA license as soon as possible, rather than on a schedule with the urban market receiving priority.

Finally, some of those partitioned areas include smaller cities or suburban areas within the MTA that may not be included in Geotek’s immediate plan for build-out, yet are not within an area served by a rural telephone company. Under RTG’s argument, those areas might never receive SMR service if the MTA licensee satisfies its construction requirements by concentrating its build-out in other regions within the MTA.

Geotek does not agree that permitting multiple players to enter the 900 MHz SMR market will have a detrimental effect to the efficiency of delivery and variety of service offerings within the SMR market. Geotek believes that expanding opportunities to enter into the market as a service provider will improve the market and in doing so, benefit the public interest.

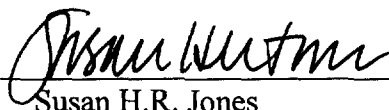
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<sup>2</sup> RTG Reply Comments at page 2.

Accordingly, Geotek urges the Commission to disregard RTG's Reply Comments  
and adopt the proposal contained in AMTA's Petition.

Respectfully submitted,

**GEOTEK COMMUNICATIONS, INC.**

By:   
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Dated: October 31<sup>st</sup>, 1996